ANALYSIS OF AMENDED BILL

Franchise Tax Board

Author: Committee on Budget | Analyst: Norman Catelli | Bill Number: SB 1849

Related Bills: See Legislative History | Telephone: 845-5117 | Amended Date: June 25, 2002

Attorney: Patrick Kusiak | Sponsor:

SUBJECT: PIT Rates/Increase Max Rates to 10% & 11% & AMT to 8.5%/Suspend NOL Deduction/Bad Debt Conformity/Collection/Delinquent Accounts

SUMMARY

Provisions of this bill would:

1. Change the top marginal personal income tax rates (PIT) from 9.3% to 10% and 11%, resume an alternative minimum tax (AMT) rate of 8.5% , and sunset those rates if certain financial goals are met (Page 2),
2. Suspend net operating losses (NOLs) for two years (Page 4),
3. Assist the Franchise Tax Board (FTB) in pursuing high-risk collection accounts to improve compliance and accelerate the collection of accounts (Page 7), and
4. Conform to federal bad debt deduction rules for banks and modify related AMT items (Page 11).

The provisions of this bill will be discussed separately.

This analysis addresses only those provisions of the bill affecting FTB.

This is the department's first analysis of this bill.

<u>Revenue Estimate:</u>

Based on the data and assumptions below, revenue effects are as follows:

Estimated Revenue Impact			
Years Beginning On or After January 1, 2002			
Fiscal Years			
(In Millions)			
	2002-3	2003-4	2004-5
10% and 11% Personal Income Tax Brackets & AMT Rate Increase	+$3,300	+$3,100	+$3,300
NOL Deductions	+$1,200	+$800	-$350
Bad Debt Reserve	+$205	+$150	+$150
FTB Collections	+$125	-	-

This analysis does not consider the possible changes in employment, personal income, or gross state product that could result from this measure.

The revenue discussion is included with each provision.

Board Position:			Department Director	Date
______ S	______ NA	______ NP		
______ SA	______ O	______ NAR	Gerald H. Goldberg	7/26/02
______ N	______ OUA	__X__ PENDING		

1. CHANGE THE MARGINAL PIT RATES

PURPOSE OF THE PROVISION

According to the author's office, the purpose of this provision is to reestablish higher marginal tax rates to address the current budget shortfall.

EFFECTIVE/OPERATIVE DATE

As an urgency statute, this bill would be effective immediately upon enactment and would be operative for taxable years beginning on or after January 1, 2002 and until certain financial goals are attained.

POSITION

Pending.

ANALYSIS

FEDERAL/STATE LAW

Federal law imposes five different income tax rates on individuals ranging from 15% to 39.1%. Existing **state law** imposes six different PIT tax rates ranging from 1% to 9.3%. Each tax rate applies to a different level of income known as a "tax bracket."

Federal law provides a personal AMT rate of 26%. Existing **state law** provides a personal AMT rate of 7%. A taxpayer with substantial income can use preferential tax benefits, such as exclusions, deductions, and credits, to reduce their income tax liability. AMT was established to ensure that a taxpayer who can use preferential tax benefits does not completely escape taxation.

THIS BILL

This bill would establish a new marginal PIT tax rate of 10% for:

- Single filers (including married filing separate) whose taxable income is over $130,000, but not over $260,000,
- Joint filers whose taxable income is over $260,000, but not over $520,000, and
- Head of household filers whose taxable income is over $176, 950, but not over $353,899.

This bill also would establish a new marginal PIT tax rate of 11% for:

- Single filers (including married filing separate) whose taxable income is over $260,000,
- Joint filers whose taxable income is over $520,000, and
- Head of household filers whose taxable income is over $353,899.

These brackets would be indexed for inflation for taxable years beginning on or after January 1, 2003, and before January 1, 2004.

The AMT rate would be changed to 8.5% for all individual taxpayers.

IMPLEMENTATION CONSIDERATIONS

Implementing this provision would require some changes to existing tax forms and instructions and information systems, which could be accomplished during the normal annual update.

TECHNICAL CONSIDERATIONS

In subparagraph A of paragraph (1) and subparagraph A of paragraph (2) of subdivision (a) of proposed Section 17041.1, the bill makes reference to paragraph (1) of subdivision (a) or subdivision (c), respectively, of Section 17041. No such paragraphs exist in subdivisions (a) and (c) of Section 17041.

LEGISLATIVE HISTORY

AB 428 (Budget Committee, 2001-2002) proposes similar rate changes for two tax years. This bill is on the Senate floor awaiting a third reading.

SB 1255 (Burton, 2001-2002) proposed similar rate changes and included a sunset date if certain financial goals were achieved. The bill was held in the Senate Revenue and Taxation Committee.

In the early 1990s California faced a severe recession, which resulted in significant shortfalls in the state budget. In response, the state acted to increase revenues and reduce expenditures. As one way of increasing revenues, the state imposed a temporary income tax rate increase in 1991, adding 10% and 11% rates for the highest income taxpayers (*SB 169, Alquist, Stats. 1991, Ch. 117*). This temporary tax increase was in effect for four taxable years and sunset for taxable years beginning on or after January 1, 1996.

During the November 1996 general election, Proposition 217 was submitted to the voters. Proposition 217 would have extended the income tax increase for higher-income taxpayers and allocated the money from the tax increase to schools and local governments. The proposition was defeated by a margin of 50.8% to 49.2%.

OTHER STATES' INFORMATION

Illinois has a flat tax rate of 3%. *Massachusetts* has a split rate, a flat tax rate of 5.6% for most income and 12% for certain capital gains, dividends, and interest. *Michigan* has a flat tax rate of 4.2%. *Minnesota* has a progressive rate with a maximum rate of 7.85%. *New York* has a progressive rate with a maximum rate of 6.85%. All these rates are for the 2001 tax year. The laws of these states were reviewed because their tax laws are similar to California's income tax laws.

FISCAL IMPACT

This bill would not significantly impact the department's costs.

ECONOMIC IMPACT

Revenue Estimate

This provision would increase state revenue:

- By $3,300 million for fiscal year 2002-2003,
- By $3,100 million for fiscal year 2003-2004, and
- By $3,300 million for fiscal year 2004-2005.

Revenue Discussion

This revenue estimate is based on the latest Personal Income Tax (PIT) Model that incorporates the latest available tax return information and the May 2002 Department of Finance forecasts. The proposed PIT 10% and 11% tax rates would only apply to any taxable year beginning on or after January 1, 2002.

Some taxpayers may opt to dispose of an asset in 2004 instead of 2003, circumventing the proposed 10% & 11% tax rates. Such tax planning may have a minor impact on the 2003-04 revenue as shown. This shifting of income is projected to be insignificant since the majority of this revenue would still occur in 2003-04 in the form of estimated payments in connection with these dispositions.

2. SUSPEND NOLs

PURPOSE OF THE PROVISION

It appears that the intent of this provision is to suspend NOLs for two years.

EFFECTIVE/OPERATIVE DATE

This bill is an urgency statute; thus, it would be effective immediately, and apply to taxable years beginning on or after January 1, 2002, and before January 1, 2004.

POSITION

Pending.

ANALYSIS

FEDERAL/STATE LAW

Simply stated, NOLs are beneficial tax rules for losses that allow a taxpayer to deduct (offset) those losses in other years when the taxpayer recognizes income.

Federal law provides, in general, that an NOL can be carried back two years and forward 20 years. Special rules are provided for the carryback of NOLs arising from specified liability losses, excess interest losses, casualty or theft losses, disaster losses of a small business, and farming losses. An NOL is defined as the excess of allowable deductions (as specifically modified) over gross income computed under the law in effect for the loss year.

Existing **state law** conforms to the federal computation of an NOL, except for the following modifications: California does not allow NOL carrybacks. In addition, depending on the type of taxpayer or amount of a taxpayer's income, the percentage of the NOL that is eligible to be carried forward and the number of years it can be carried forward varies.

Existing **state law** provides for seven different types of NOLs:

Type of NOL	NOL % Allowed to be Carried Over	Carryover Period
General NOL	55% (2000 - 2001) 60% (2002 - 2003) 65% (2004 - on)	10 Years
New Business Year 1 Year 2 Year 3	100% 100% 100%	10 Years
Eligible Small Business	100%	10 Years
Specified Disaster Loss	100% 50%	5 Years 10 Years
Economic Development Areas	100%	15 Years

Special NOL treatment as stated in the above chart is provided for the following taxpayers:

New businesses that are engaged in a trade or business activity that first commenced in California on or after January 1, 1994. “New business” special NOL treatment also applies to taxpayers engaged in certain biopharmaceutical activities for taxable years beginning on or after January 1, 1997, that have not received approval for any product from the U.S. Food and Drug Administration.

For taxable years beginning on or after January 1, 1994, eligible small businesses that are engaged in a trade or business activity with gross receipts, less returns and allowances, of less than $1 million during the taxable year.

Taxpayers that suffer a casualty loss in an area declared a disaster area by the President or Governor may carry over 100% of an NOL for five years and 50% of any NOL remaining after the first five years for an additional 10 years.

Taxpayers that operate a business in an Economic Development Area, including a Local Agency Military Base Recovery Area (LAMBRA), a Targeted Tax Area (TTA), or an Enterprise Zone (EZ).

<u>THIS PROVISION</u>

This bill would suspend all NOLs for the 2002 and 2003 taxable years, and extend carryover periods to reflect the suspension. The carryover period for losses incurred in taxable years beginning on or after January 1, 2002, and before January 1, 2003, would be extended by one year. The carryover period for losses incurred in taxable years beginning before January 1, 2002, would be extended by two years.

IMPLEMENTATION CONSIDERATIONS

Implementing this provision of the bill would not significantly impact the department's programs and operations.

OTHER STATES' INFORMATION

The laws of *Florida, Illinois, Massachusetts, Michigan, and Minnesota* were reviewed because their tax laws are similar to California's income tax laws.

Florida income tax law, with respect to corporations, provides a 20-year carryover period but no carryback, and otherwise conforms to federal NOL laws. *Florida* has no personal income tax.

Illinois income tax law conforms to federal law regarding NOLs.

Massachusetts income tax law does not allow NOL treatment for personal income taxpayers, but corporations are allowed a 100% NOL that applies to the first five years of the entity's existence.

Michigan income tax law conforms to federal NOL laws, including the allowance of NOL carrybacks for corporations. However, *Michigan's* personal income tax law does not allow NOL carrybacks.

Minnesota personal income tax law conforms to federal NOL laws, while corporate taxpayers have no NOL carrybacks and only a 15-year carryforward period.

LEGISLATIVE HISTORY

SB 169 (Alquist, Stats. 1991, Ch. 117) and AB 31 (Klehs, Stats. 1991, Ch. 474) suspended NOLs for taxable periods beginning in 1991 and 1992. The carryover for losses incurred in 1991 was extended by one year. The carryover period for losses incurred prior to 1991 was extended by two years.

AB 433 (Budget Committee, 2001-2002), contains similar provisions as this bill. AB 433 would allow an 80% NOL amount when the suspension period expires. The bill is on the Assembly floor awaiting a third reading.

FISCAL IMPACT

This bill would not significantly impact the department's costs.

ECONOMIC IMPACT

Revenue Estimate

This provision would increase state revenue:

- By $1,200 million for fiscal year 2002-2003,
- By $ 800 million for fiscal year 2003-2004, and

Decrease state revenue by $ 350 million for fiscal year 2004-2005.

Revenue Discussion

This revenue estimate is based on current departmental information on the utilization of NOLs, adjusted for projected NOL usage in affected years and other pertinent factors.

3. PURSUE HIGH-RISK COLLECTIONS

PURPOSE OF THE PROVISION

This provision would allow FTB to identify and offer eligible taxpayers the opportunity to satisfy an unpaid tax liability by paying the tax in full and receiving a waiver of interest, penalties, and fees.

EFFECTIVE/OPERATIVE DATE

As an urgency measure, this bill would become effective upon enactment and states that this provision would be operative October 1, 2002 through June 30, 2003.

POSITION

Pending.

ANALYSIS

FEDERAL/STATE LAW

Existing federal and state law imposes tax on the income earned by individuals, estates, trusts, and certain business entities. In addition, penalties and fees can be imposed on those taxpayer's that fail to file their tax returns or pay their taxes in full.

For state purposes, tax is imposed on the entire taxable income of residents of California and upon the taxable income of nonresidents derived from sources within California. The tax for individuals is computed on a graduated scale at rates ranging from 1% to 9.3%. If the taxpayer fails to report or pay their state taxes in full, FTB notifies the taxpayer that collection action may commence, which may include wage garnishments, liens, or other forms of levies.

Existing state law imposes interest on any payment of tax that is not paid on or before the last date prescribed for payment and establishes the applicable rate of interest.

The following are the more commonly imposed penalties under current state income tax laws against taxpayers that do not report or underreport their income, or do not pay deficiency assessments:

- Late filing – income tax returns that are filed late are subject to two types of late filing penalties: (1) a basic penalty of 5% of the tax for each month that the return is late, up to a maximum of 25% of the tax, or (2) a minimum penalty of the lesser of $100 or 100% of the tax liability, if the return is filed 60 days or more late and the basic penalty is less than $100. If the failure to file is due to fraud, the basic penalty is 1% per month, up to a maximum of 75%.

- Underpayment – income taxes that are not paid by the original due date of the income tax return are subject to a penalty of 5% of the unpaid tax PLUS 1/2 of 1% per month, up to a maximum of 40 months (20%).

- Demand – income tax returns that are not filed upon notice and demand from the FTB are subject to a penalty of 25% of the amount of the tax required to be shown on the return.

- Frivolous return – income tax returns that are not sufficiently completed to substantially determine the correct self-assessed tax are subject to a penalty of $500.

- Accuracy-related – substantial understating of income tax, overstating values of items, or overstating pension liabilities are subject to a penalty of 20% of the additional tax that is accuracy related. If the misstatements are due to fraud, the penalty is 75% of that resulting tax.

In addition, taxpayers that fail to file returns or pay their income tax liabilities may be liable for the following fees relating to the enforcement of the income tax return filing requirement or collection of the tax liability:

- Filing enforcement cost recovery fee -- for individuals that fail to file income tax returns within 25 days after FTB mails its formal legal demand for the returns.

- Collection cost recovery fee -- for individuals that fail to pay their income taxes after FTB mails a notice for payment that advises that continued nonpayment may result in collection action.

<u>THIS PROVISION</u>

For the period of October 1, 2002, through June 30, 2003, this provision would allow FTB to identify eligible taxpayer's with high-risk collection accounts and offer those taxpayer's the opportunity to satisfy an unpaid tax liability by paying the tax in full and receiving a waiver of interest, penalties, and fees. For purposes of this provision, the following terms are defined:

- Eligible taxpayer – any taxpayer notified by FTB that their unpaid tax liabilities may be satisfied with the payment of an "eligible amount."
- Eligible amount – an amount equal to the "unpaid tax liability" less interest, penalties, and fees. The amount must be paid in one or more installments, as determined by FTB, before the due date established by FTB, which would be no later than June 30, 2004.
- High-risk collection account – any "unpaid tax liability" where satisfaction is in the best interest of the state. These accounts include any unpaid tax liability where FTB determines:
  - efforts to collect the unpaid tax would be uneconomical, or
  - the unpaid tax liability would not be fully paid within a reasonable period of time.
- Unpaid tax liability – any final assessment under the Personal Income Tax Law including tax, penalties, interest, and fees that are owed by an individual and are unpaid as of October 1, 2002. Assessments resulting from a proposed assessment issued to a taxpayer for the failure to file a tax return are excluded.

In addition, this provision would clarify that:

- No refund or credit will be granted for any penalty or interest paid prior to October 1, 2002.
- The determinations made by FTB under this provision are final and conclusive.
- FTB will not be required to disclose standards used in making the determinations under this bill or the information used for determining those standards if it is determined that the disclosure will seriously impair assessment, collection, or enforcement of the income tax laws.
- FTB is not authorized under this provision to compromise any final tax liability, and the laws regarding administrative regulations and rulemaking are not applicable for purposes of implementing and administering this provision.

This provision of the bill would be repealed as of December 31, 2004.

IMPLEMENTATION CONSIDERATION

Although this provision would significantly impact the department, as stated below under Fiscal Impact, implementation of this provision could be accomplished by the operative date of October 1, 2002.

PROGRAM BACKGROUND

FTB currently uses an automated billing/collection system to collect the majority of its delinquent accounts. Taxpayers with tax delinquencies receive one or more notices that range from notices of tax due, to notices that provide that continued failure to pay will result in additional collection actions, to notices of state tax liens. FTB's notices of state tax liens are routinely issued on PIT delinquencies when the amount is sufficient to warrant such action.

If after several years, FTB cannot locate assets belonging to the debtor and determines that the chances of collecting a delinquency would be remote, the account may be discharged from collection accountability pursuant to the Government Code. However, in the event an employer, a bank account, or any other readily accessible asset is identified, FTB uses its automated system to issue levies on those assets. In addition, if an overpayment of tax from another tax year is subject to refund, the overpayment is applied against the discharged delinquency before any remaining overpayment is refunded.

LEGISLATIVE HISTORY

AB 433 (Budget Committee, 2001-2002) contains the same language as this provision. AB 433 is on the Assembly floor awaiting a third reading.

SB 1439 (Oller, 2001/2002) would create an amnesty program for certain taxpayers that have failed to file income tax returns. This bill is with the Assembly Appropriations Committee.

AB 3230 (Hannigan; Stats. 1984, Ch. 1490) provided for an amnesty program for individual taxpayers relating to the nonpayment and underreporting of tax or the nonpayment of any previously assessed tax.

ABX 8 and AB 2635 (Martinez; 1997/98) both would have provided an income tax amnesty program. The revenue generated from the program would have been transferred to special funds to provide disaster loss assistance and provide relief from damages caused by uninsured motorists, respectively. Neither bill passed its first policy committee.

OTHER STATES' INFORMATION

According to information furnished by the Federation of Tax Administrators, many states have offered, or are currently offering, tax amnesty programs similar to SB 1439 as described above. Although some of the states offer tax amnesty to taxpayers that have unpaid liabilities in their current accounts receivables inventory as well as those taxpayers that have not filed returns, it is unclear whether the unpaid accounts were required to meet specific criteria to be eligible for amnesty.

FISCAL IMPACT

The costs to implement this provision have been estimated at $3.3 million for 41 limited-term positions (32.5 PYs) effective for the period of September 1, 2002, through August 31, 2003.

This bill would require the department to make programming changes to various systems and implement quality control procedures, train staff, develop and maintain a database, respond to inquiries from both eligible and non-eligible taxpayers, and manually process 500,000 accounts and the related correspondence.

ECONOMIC IMPACT

<u>Revenue Estimate</u>

This provision would increase state revenue by $125 million during fiscal year 2002-2003.

<u>Revenue Discussion</u>

The projected revenue increase is based on a universe of 500,000 high-risk accounts with an average unpaid tax of $2,500 at a projected recovery rate of 10%, resulting in a $125 million revenue gain. Due to the type of accounts involved in this proposal, it is expected that any of this accelerated revenue that may have been collected in subsequent years would be insignificant in amount. Therefore, no revenue offset is projected for subsequent years.

POLICY CONCERNS

This provision could be construed to be unfair since many taxpayers with unpaid tax liabilities would not be eligible for, or offered the relief of, this provision since the department may not consider these taxpayers to be high-risk. In addition, the enactment of this provision and SB 1439 could cause confusion for taxpayers since this provision would require FTB to notify taxpayers that are eligible for interest, penalty, and fee relief as opposed to SB 1439, which would require taxpayers to apply for tax amnesty.

This provision could improve compliance with state tax laws and accelerate the collection of accounts that are determined to be at high risk for collection.

<u>4. CONFORM TO FEDERAL BAD DEBT DEDUCTION RULES FOR BANKS</u>

PURPOSE OF THE PROVISION

It appears that the intent of this provision is to conform to federal law relating to bank bad debt deductions.

EFFECTIVE/OPERATIVE DATE

This bill is an urgency statute; thus, it would be effective immediately and apply to taxable years beginning on or after January 1, 2002.

POSITION

Pending.

ANALYSIS

FEDERAL/STATE LAW

Under **federal law**, for taxable years after 1986, bad debts are deducted in the year they become worthless unless the taxpayer is allowed to use the reserve for bad debt method under IRC Section 585. Under this method, the additions to the reserve that may be deducted can not bring the reserve above the loans outstanding at year-end, multiplied by a six-year moving average percentage (the experience method). Under current federal law, the term “bank” includes a domestic building and loan association (a thrift institution)(IRC Section 581).

Banks (including a thrift institution) are the only taxpayers allowed to use that method and only if they are not “large banks” (including thrift institutions). A large bank (including a thrift institution) is one where the average of all its assets is greater than $500 million during any taxable year beginning after December 31, 1986.

For taxable years beginning after December 31, 1995, a thrift financial institution is included in the definition of “bank” is required to calculate its bad debt deduction pursuant to IRC 585.

Under current **California law**, all banks, mutual savings banks, co-operative banks, building and loan associations and other savings institutions are allowed to use the reserve for bad debt method regardless of the size of its assets. In addition, the experience method calculations under the California regulations are based on the greater of a three- or six-year moving average rather than the federal six-year moving average. California also provides an additional amount may be deducted if the taxpayer is able to establish that additions to the reserve under the normal California computation are insufficient to absorb anticipated losses. In no event may loss charged to reserve for any loan be greater than that charged or reported to regulatory agencies, or reported in financial statements (R&TC Section 24348).

Federal law provides a corporate AMT rate of 20%. Existing **state law** provides a corporate AMT rate of 6.65%. A taxpayer with substantial income can use preferential tax benefits, such as exclusions, deductions, and credits, to reduce their income tax liability. AMT was established to ensure that a taxpayer who can use preferential tax benefits does not completely escape taxation.

THIS PROVISION

This provision would conform to federal law (IRC Section 585) with respect to the bad debts.

Thus, for taxable years beginning on or after January 1, 2002:

- Bad debts would be deducted in the year they become worthless unless the taxpayer is allowed to use the reserve for bad debt method under IRC Section 585 for federal purposes.
- Banks (including a thrift institution) are the only taxpayers allowed to use that method and only if they are not “large banks” (including thrift institutions).

- The proposal does not provide any carryback rules, any election options contained in federal 1986 or 1995 transitional rules under IRC Section 585 or IRC Section 593, or any changes to the net operating loss rules. Instead, it goes directly to the rules contained in IRC Section 585.
- However, it would allow the adjustment to income resulting from this change regarding the use of bad debt reserves at the beginning of 2002 to be taken into income over four years.

Additionally, this provision eliminates the AMT tax preference item that was generated by the excess of the deduction allowed by the reserve method over the actual method.

IMPLEMENTATION CONSIDERATIONS

Implementing this provision would require some changes to existing tax forms and instructions and information systems, which could be accomplished during the normal annual update.

LEGISLATIVE HISTORY

AB 433 (Budget Committee, 2001-2002) contains a similar provision. AB 433 would allow 50% of the excess reserve to be taken to income in the first year. The other portion would not be considered. AB 433 is on the Assembly floor awaiting a third reading.

OTHER STATES' INFORMATION

Based on available information regarding other states, 15 states, including *North Carolina* and *Texas*, do not impose an income tax or franchise tax on banks, so the bad debt reserve is not part of the tax base and not an issue. There are 27 states, including *Massachusetts*, *Michigan*, and *Illinois*, that conform to federal treatment of bad debts and have not allowed large banks to use the reserve method of accounting for bad debts since 1986, and have not allowed large thrifts to use the reserve method of accounting for bad debts since 1995. Of the remaining seven states, four allow a reserve method of accounting more restrictive than the federal method. Three states, *Alabama*, *New York*, and *South Carolina* (as well as *California*), allow a less restrictive reserve method of accounting for bad debts.

FISCAL IMPACT

This bill would not significantly impact the department's costs.

ECONOMIC IMPACT

Revenue Estimate

This provision would increase state revenue

- By $205 million for fiscal year 2002-2003,
- By $150 million for fiscal year 2003-2004, and
- By $150 million for fiscal year 2004-2005.

Revenue Discussion

Estimates above reflect revenue gains from taking into income the reserve balances when an entity changes to the specific charge-off method, a method based on writing-off actual account balances rather than an estimate total amount. For federal purposes, large banks were required to recapture their bad debt reserves into income over a four-year period, and savings and loan associations, a six-year period.

Estimates here reflect recapture spread ratably over four years.

Additional revenue effects would result in a repeal scenario due to the net difference in annual additions to reserves and specific charge-offs against income. The bad debt reserve method is generally considered more favorable to the taxpayer than the specific charge-off method. Assuming lender loan bases continue to increase, this favorable relationship would continue.

Therefore, we would expect additional revenue gains attributed to the difference in deductions. The revenue gains are expected to be very small relative to the impact of the recapture of bad debts.

LEGISLATIVE STAFF CONTACT

Norman Catelli
Franchise Tax Board
845-5117
Norm.Catelli@ftb.ca.gov

Brian Putler
Franchise Tax Board
845-6333
Brian.Putler@ftb.ca.gov